

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RONALD MCLANE
78 Ash Circle
Andreas, PA 18211

CIVIL ACTION

Plaintiff,
v.

No.: _____

NESTLÉ PURINA PETCARE COMPANY
d/b/a Nestlé and Purina
1 Checkerboard Square
St. Louis, MO 63164

JURY TRIAL DEMANDED

Defendant.

CIVIL ACTION COMPLAINT

Ronald McLane, by and through his undersigned counsel, hereby avers as follows:

INTRODUCTION

1. Ronald McLane (*hereinafter* “Plaintiff, unless otherwise indicated) has initiated this action to redress violations by Nestlé Purina Petcare Company d/b/a Nestlé and Purina of the American’s with Disabilities Act, as amended (“ADA” – 42 U.S.C. §§ 12101 *et. seq.*), and the Age Discrimination in Employment Act (“ADEA” – 29 U.S.C. §§ 621 *et. seq.*). As a direct consequence of Defendant’s unlawful actions, Plaintiff seeks damages as set forth herein.

JURISDICTION AND VENUE

2. This Court has original subject matter jurisdiction over the instant action pursuant to 28 U.S.C. §§ 1331 and 1333(a)(4) because it arises under the laws of the United States and seeks redress for violations of federal laws.

3. This Court may properly assert personal jurisdiction over Defendant because its contacts with this state and this judicial district are sufficient for the exercise of jurisdiction over

Defendant to comply with traditional notions of fair play and substantial justice, satisfying the standard set forth by the United States Supreme Court in *International Shoe Co. v. Washington*, 326 U.S. 310 (1945) and its progeny.

4. Pursuant to 28 U.S.C. § 1331(b)(1) and (b)(2), venue is properly laid in this district because Defendant is deemed to reside where they are subjected to personal jurisdiction, rendering Defendant a resident of the Eastern District of Pennsylvania.

5. Plaintiff is proceeding herein under the ADA and the ADEA after properly exhausting all administrative remedies with respect to such claims by timely filing a Charge of Discrimination with the Equal Employment Opportunity Commission (“EEOC”) and by filing the instant lawsuit within ninety (90) days of receiving a notice of dismissal and/or right to sue letter from the EEOC.

PARTIES

6. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

7. Plaintiff is an adult individual, with an address as set forth in the caption.

8. Defendant Nestlé Purina Petcare Company d/b/a Nestlé and Purina (*hereinafter* Defendant) is a subsidiary of the transnational company Nestlé S.A., located at the above-captioned address engaging in the business of selling pet food, treats, and litter.

9. At all times relevant herein, Defendant acted by and through its agents, servants and employees, each of whom acted at all times relevant herein in the course and scope of their employment with and for Defendant.

FACTUAL BACKGROUND

10. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

11. Plaintiff is a 53-year-old individual born on June 20, 1964.

12. Plaintiff was hired by Defendant on or about April 14, 2014 as a Maintenance Supervisor.

13. While employed with Defendant, Plaintiff was a dedicated and hard-working employee who performed his job well.

14. At all relevant times during Plaintiff's employment with Defendant, he suffered from various disabilities such as post-traumatic stress disorder ("PTSD"), permanent bronchitis, joint pain in his knees and sciatic nerve damage related to his thirteen (13) years of military service.

15. As a result of his serious health conditions (discussed *supra*), Plaintiff (at times) was limited in his ability to lift, stand and walk.

16. Despite his aforementioned health conditions and limitations, Plaintiff was still able to perform the duties of his job well with Defendant; however, Plaintiff did require reasonable medical accommodations at times (discussed further *infra*).

17. In or about late 2016, Plaintiff began reporting to George Lamper (Supervisor – *hereinafter* "Lamper").

18. Upon information and belief, Lamper was in his approximate 20s when he began supervising Plaintiff.

19. While Plaintiff was under the supervision of Lamper, he apprised Lamper of his aforesaid disabilities and need for accommodations when suffering a flare up of his health

conditions, including but not limited to intermittent time off from work to care for and treat his health conditions.

20. Prior to being placed on a Performance Improvement Plan (“PIP,” discussed *infra*), Plaintiff notified Lamper he would take intermittent time off from work to treat his health conditions at the Veteran’s Affairs Department (“VA”).

21. On or about December 15, 2016, Plaintiff was placed on a PIP by Defendant, issued by Lamper.

22. Upon information and belief, prior to being issued the PIP, Plaintiff demonstrated competent workmanship and had limited performance issues with previous supervisors.

23. During Plaintiff’s 90-day PIP review, he was subjected to discriminatory and retaliatory treatment because of his age, disabilities, and requests for reasonable accommodations.

24. For example, Plaintiff was continually questioned about the legitimacy of his disabilities and the requested medical leave he would take when his disabilities flared up (as discussed *supra*).

25. During Plaintiff’s aforementioned 90-day PIP review, Plaintiff met with Matt Price (“Price”), Lamper’s successor, to review his performance.

26. Upon information and belief, Price was in his late 20s early 30s when he began supervising Plaintiff.

27. Plaintiff received reviews of “met expectations” during the end of his PIP review, and ultimately was taken off PIP review on or about May 2, 2017.

28. During this time, and despite taking him off the aforesaid PIP (as they had no reason not to), Defendant’s management continually discriminated and harassed Plaintiff by

treating Plaintiff in a rude and demeaning manner and asking/pressuring Plaintiff to leave his employment with Defendant.

29. For example, Price (who had also been apprised of Plaintiff's health conditions) would ask Plaintiff if he was going to be leaving Defendant since he heard a rumor that Plaintiff was receiving large sums of money from the VA.

30. In or around late June of 2017, Plaintiff requested a brief medical leave of absence due to a flare up of his disabilities.

31. Plaintiff returned to work from his aforesaid medical leave of absence on or about July 5, 2017 and on the same day was immediately suspended without pay.

32. On or about July 11, 2017, Defendant terminated Plaintiff's employment for completely pretextual reasons.

33. Plaintiff was replaced in his position by Robert Jennings, an individual younger than Plaintiff.

34. It is believed and therefore averred that Plaintiff was discriminated against and later terminated because of his age, actual/perceived/record of disabilities, and/or because of his request for accommodations (including but not limited to medical leave).

COUNT I

Violations of the Americans with Disabilities Act, as amended ("ADA")

([1] Actual/Perceived/Record of Disability Discrimination; [2] Retaliation; [3] Hostile Work Environment)

35. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

36. Plaintiff suffered from qualifying health conditions under the ADA (as amended), which (at times) affected his ability to perform some daily life activities, including but not limited to working, lifting, walking and bending (among other daily life activities).

37. Plaintiff requested reasonable accommodations from Defendant, including but not limited to intermittent and block medical leave.

38. In or about June of 2017, Plaintiff requested and received a brief medical leave due to a flare up regarding his aforesaid disabilities.

39. Upon returning to work on or about July 5, 2017, Plaintiff was immediately suspended without pay.

40. Plaintiff was thereafter ultimately terminated from Defendant on or about June 11, 2017 because of: (1) his known and/or perceived disabilities: (2) his record of impairment; and/or (3) because he requested accommodations.

41. Plaintiff was also subjected to a hostile work environment during his period of employment because of: (1) his known and/or perceived disabilities: (2) his record of impairment; and/or (3) because he requested accommodations through disparate treatment, pretextual admonishment, and demeaning and/or discriminatory treatment towards him.

42. These actions as aforesaid constitute unlawful discrimination and retaliation under the ADA.

COUNT II
Violations of the Age Discrimination in Employment Act (“ADEA”)
(Age Discrimination)

43. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

44. Plaintiff believes and avers herein that Defendant terminated his employment because of his advanced age.

45. Upon termination, Defendant replaced Plaintiff's position with an individual younger in age than Plaintiff.

46. These actions as aforesaid constitute unlawful age discrimination under the ADEA.

COUNT III
Violations of the Family and Medical Leave Act ("FMLA")
(Interference and Retaliation)

47. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

48. Plaintiff was an eligible employee under the definitional terms of the FMLA, 29 U.S.C. § 2611(a)(i)(ii).

49. Plaintiff requested leave from Defendant, his employer, with whom he had been employed for at least twelve months pursuant to the requirements of 29 U.S.C.A § 2611(2)(i).

50. Plaintiff had at least 1,250 hours of service with the Defendant during his last full year of employment.

51. Defendant is engaged in an industry affecting commerce and employs fifty (50) or more employees for each working day during each of the twenty (20) or more calendar work weeks in the current or proceeding calendar year, pursuant to 29 U.S.C.A § 2611(4)(A)(i).

52. Plaintiff was entitled to receive leave pursuant to 29 U.S.C.A § 2612 (a)(1) for a total of twelve (12) work weeks of leave on a block or intermittent basis.

53. Defendant committed interference and retaliation violations of the FMLA by: (1) disciplining and/or terminating Plaintiff for requesting and/or exercising his FMLA rights and/or for taking FMLA-qualifying leave; (2) by considering Plaintiff's FMLA leave needs in making the decision to issue him discipline and/or terminate him; and/or (3) disciplining and/or terminating Plaintiff to prevent him from taking further FMLA-qualifying leave in the future.

54. These actions as aforesaid constitute violations of the FMLA.

WHEREFORE, Plaintiff prays that this Court enter an Order providing that:

- A. Defendant is to promulgate and adhere to a policy prohibiting discrimination in the future against any employee(s);
- B. Defendant is to compensate Plaintiff, reimburse Plaintiff, and make Plaintiff whole for any and all pay and benefits Plaintiff would have received had it not been for Defendant's illegal actions, including but not limited to back pay, front pay, salary, pay increase, bonuses, insurance, and benefits.
- C. Plaintiff is to be awarded actual damages, as well as damages for the pain, suffering, and humiliation caused by Defendant's actions;
- D. Plaintiff is to be awarded liquidated and/or punitive damages, as permitted by applicable law(s) alleged asserted herein, in an amount believed by the Court or trier of fact to be appropriate to punish Defendant for its willful, deliberate, malicious and outrageous conduct and to deter Defendant or other employers from engaging in such misconduct in the future;
- E. Plaintiff is to be accorded other equitable and legal relief as the Court deems just, proper, and appropriate; and
- F. Plaintiff is to be awarded the costs and expenses of this action and reasonable attorney's fees as provided by applicable federal and state law.

Respectfully submitted,

KARPF, KARPF & CERUTTI, P.C.

By:


Ari R. Karpf, Esq.
3331 Street Rd.
Two Greenwood Square, Suite 128
Bensalem, PA 19020
(215) 639-0801

Date: April 13, 2018

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIACASE MANAGEMENT TRACK DESIGNATION FORM

CIVIL ACTION

Ronald McLane

v.

Nestle Purina Petcare Company d/b/a Nestle and Purina

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

(a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()

(b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()

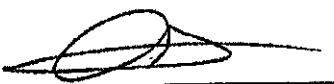
(c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()

(d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()

(e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()

(f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

4/16/2018
Date
(215) 639-0801



Attorney-at-law
(215) 639-4970

Plaintiff
Attorney for
akarpf@karpf-law.com

Telephone
FAX Number

E-Mail Address

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 78 Ash Circle, Andreas, PA 18211

Address of Defendant: 1 Checkerboard Square, St. Louis, MO 63164

Place of Accident, Incident or Transaction: Defendant's place of business

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes No

Does this case involve multidistrict litigation possibilities?

Yes No

RELATED CASE, IF ANY:

Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
Yes No
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
Yes No
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
Yes No
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?
Yes No

CIVIL: (Place in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. Indemnity Contract, Marine Contract, and All Other Contracts
2. FELA
3. Jones Act-Personal Injury
4. Antitrust
5. Patent
6. Labor-Management Relations
7. Civil Rights
8. Habeas Corpus
9. Securities Act(s) Cases
10. Social Security Review Cases
11. All other Federal Question Cases
(Please specify) _____

B. Diversity Jurisdiction Cases:

1. Insurance Contract and Other Contracts
2. Airplane Personal Injury
3. Assault, Defamation
4. Marine Personal Injury
5. Motor Vehicle Personal Injury
6. Other Personal Injury (Please specify)
(Please specify) _____
7. Products Liability
8. Products Liability — Asbestos
9. All other Diversity Cases

I, Ari R. Karpf

Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

Relief other than monetary damages is sought.

DATE: 4/16/2018



ARK2484

Attorney I.D.# 91538

NOTE: A trial de novo will be a trial by jury only if there has been compliance with P.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 4/16/2018

Attorney-at-Law

ARK2484

Attorney I.D.# 91538

CIV. 609 (5/2012)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

MCLANE, RONALD

(b) County of Residence of First Listed Plaintiff Schuylkill
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Karpf, Karpf & Cerutti, P.C.; 3331 Street Road, Two Greenwood Square, Suite 128, Bensalem, PA 19020; (215) 639-0801; akarpf@karpf-law.com

DEFENDANTS

NESTLE PURINA PETCARE COMPANY d/b/a
NESTLE AND PURINACounty of Residence of First Listed Defendant Clayton
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

1 U.S. Government Plaintiff	<input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	1	1	Incorporated or Principal Place of Business In This State	4	4
Citizen of Another State	2	2	Incorporated and Principal Place of Business In Another State	5	5
Citizen or Subject of a Foreign Country	3	3	Foreign Nation	6	6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORECLOSURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> PERSONAL INJURY	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury		<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Product Liability		<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability		<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 370 Other Fraud		<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 371 Truth in Lending		<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 380 Other Personal Property Damage		<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 385 Property Damage		<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 390 Other Product Liability		<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 400 Other Fraud		<input type="checkbox"/> 850 Securities/Commodities/ Exchange
<input type="checkbox"/> 196 Franchise		<input type="checkbox"/> 411 Voting		<input type="checkbox"/> 890 Other Statutory Actions
		<input type="checkbox"/> 442 Employment		<input type="checkbox"/> 891 Agricultural Acts
		<input type="checkbox"/> 443 Housing/ Accommodations		<input type="checkbox"/> 893 Environmental Matters
	<input checked="" type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment		<input type="checkbox"/> 895 Freedom of Information Act
		<input type="checkbox"/> 446 Amer. w/Disabilities - Other		<input type="checkbox"/> 896 Arbitration
		<input type="checkbox"/> 448 Education		<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
		<input type="checkbox"/> 449 Other Civil Rights	<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 950 Constitutionality of State Statutes
		<input type="checkbox"/> 450 Voting	<input type="checkbox"/> 720 Labor/Management Relations	
		<input type="checkbox"/> 451 Housing/ Accommodations	<input type="checkbox"/> 730 Family and Medical Leave Act	
		<input type="checkbox"/> 452 Amer. w/Disabilities - Employment	<input type="checkbox"/> 740 Railway Labor Act	
		<input type="checkbox"/> 453 Amer. w/Disabilities - Other	<input type="checkbox"/> 750 Other Labor Litigation	
		<input type="checkbox"/> 454 Education	<input type="checkbox"/> 791 Employee Retirement Income Security Act	
		<input type="checkbox"/> 460 Other Civil Rights		
		<input type="checkbox"/> 461 Alien Detainee		
		<input type="checkbox"/> 462 Employment		
		<input type="checkbox"/> 463 Mandamus & Other		
		<input type="checkbox"/> 464 Housing/ Accommodations		
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